

Whistleblower Policy Statement

Introduction

The Whistleblower Policy Statement (the Policy) outlines the commitment of Ittihad International Investment LLC (III) and its subsidiaries (henceforth referred to as 'III' or 'the Group') to encourage whistleblowers to report instances, or suspected instances, of unethical or illegal conduct.

This Policy applies to III and any of its subsidiaries that do not have dedicated policies in place suitable to their operations. The Policy applies to all areas of the Group's business operations and covers all directors, executives, and employees working for or on behalf of the Group. The Policy also covers outsourced or seconded employees working exclusively for or on behalf of the Group as well as any third parties working at the Group's premises.

The commitments outlined in this Policy are also addressed in the Group's Code of Ethics and Business Conduct Policy Statement while detailed guidelines for handling reports are outlined in III's Whistleblowing Policies and Procedures Manual.

Policy Commitments

III strictly prohibits unethical behavior, or any conduct that violates laws, regulations, or the Group's internal policies including, but not limited to, fraud; money laundering; bribery and corruption; theft, violence, or property damage; financial irregularities and manipulation.

Whistleblowers may report:

- Any act that violates the Group's Corporate Governance Manual, including the Code of Conduct and any act that adversely affects the business interests of the Group.
- Any act that violates the Group's Articles of Association, including any rules, regulations, announcements, and policies.
- Any act that is illegal under local or international law.

This Policy supports the reporting and investigation of instances, or suspected instances of such conduct, while also acting as a deterrent and ensures that whistleblowers are protected from retaliation.

Reporting Violations

Whistleblowers are advised to report their concerns promptly via the official Whistleblower Service through the following email: whistleblower.iii@ittihadinvestment.ae. They may also report the incident directly to

the Nomination, Remuneration, and Governance Committee (NRGC).

Protection from Retaliation

Under the United Arab Emirates (UAE) law, whistleblowers are protected from retaliation and are not required to prove their allegations. All reasonable steps will be taken to protect the whistleblower from any form of retaliation including, but not limited to, harassment, intimidation, or bullying; threats to cause harm; dismissal or alteration of an employee's position to their disadvantage. Whistleblowers may report any such cases to the Whistleblower Report Officer or the Whistleblower Service.

Confidentiality

We are dedicated to safeguarding the privacy of individuals who report any potential wrongdoing in good faith and without malicious intent, taking their concerns very seriously. We will not reveal any information that could identify the person making the report without their permission, except when legally required to do so by the authorities.

Those who report concerns are expected to keep their actions confidential and not disclose that they have reported anything. Additionally, everyone involved in the reporting and investigation process must maintain strict confidentiality regarding any information shared with them. The identities of individuals involved, and any mentioned business partners will be kept confidential.

False or Malicious Reports

Whistleblower reports must be made in good faith. Reports that are deliberately false or misleading and made with malicious intent will be considered in breach of III's Code of Conduct and Business Ethics and may result in disciplinary action.

Investigation of Reports

The Whistleblower Report Officer appoints a Whistleblower Investigation Officer to review and investigate the report. Once the report has been reviewed, a conclusion will be reported to the NRGC for further action, if any. Should the NRGC decide to proceed with a full investigation, it will be carried out with independence, objectivity, impartiality, fairness, and integrity.

Stakeholder Engagement

III engages with relevant stakeholders to better understand their ethical conduct concerns and endeavors to integrate these considerations into this Policy and its underlying procedures, as appropriate.

Training and Awareness

III provides appropriate training and awareness for its employees to enable them to uphold the provisions of this Policy and to understand how violations could negatively impact the Group's operations and its stakeholders.

Compliance

III complies with applicable laws and regulations of the UAE and/or any jurisdiction in which the Group operates. Subsidiaries registered and operating in countries other than the UAE comply fully with the laws of the host country in addition to any applicable laws of the UAE. In the event that the host country's requirements are less comprehensive than III's standards, the Group's standard will apply.

Roles and Responsibilities

The Board of Directors is responsible for overseeing the implementation and effectiveness of this Policy. All stakeholders covered by the Policy are responsible for complying with its requirements. Stakeholders should address any queries regarding the application and interpretation of the Whistleblowing policies and procedures to the Group Compliance Officer.

Reporting and Transparency

All Whistleblower Reports will be stored by III for a period of 30 days or 60 days if there is an investigation. However, if a criminal proceeding is initiated then documents may be retained for up to seven years.

Any employee or individual covered by this Policy that identifies a violation, or a suspected violation, of this Policy is encouraged to report the matter. As per III's Whistleblower Policy, they can submit a report to the official Whistleblower Service through the following email: whistleblower.iii@ittihadinvestment.ae. Reports can be submitted in confidence, anonymously, and free from fear of retaliation. The Group will investigate all reports in accordance with defined guidelines provided they are submitted in good faith.

Policy Review

The Group will review this Policy annually, or sooner if required, and revise this to ensure it remains up-to-date and aligned with the company's Mission, Vision, core values, laws, and regulations of the UAE and/or host country of its operations, and with global best practices. The Group shall make available on the appropriate channels any changes to this Policy, and every version will have an updated effective date.

The Board of Directors has reviewed and approved this Whistleblower Policy Statement.